

1 HONORABLE RICARDO S. MARTINEZ
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8 **UNITED STATES DISTRICT COURT**
9 **FOR THE WESTERN DISTRICT OF WASHINGTON**
10 **AT SEATTLE**

11 MADISON ARBOR HOMEOWNERS'
12 ASSOCIATION, a Washington non-profit
13 corporation,

14 Plaintiff,

15 vs.

16 FARMINGTON CASUALTY COMPANY,
17 a Connecticut company, STATE FARM
18 FIRE & CASUALTY COMPANY, an
19 Illinois corporation, THE CHARTER OAK
20 FIRE INSURANCE COMPANY, a
21 Connecticut company, THE TRAVELERS
22 INDEMNITY COMPANY, a Connecticut
23 company,

24 Defendants.

25 NO. 2:22-cv-00977-RSM
STIPULATED MOTION TO
CONTINUE TRIAL DATE

NOTE ON MOTION CALENDAR:
APRIL 7, 2023

The parties stipulate to continue the trial date to December 4, 2023, or to such other time as the court deems appropriate. The parties stipulate that all related pretrial deadlines should be extended a similar amount of time. Counsel for the parties believe they can complete discovery by August 4, 2023.

STIPULATED MOTION TO CONTINUE TRIAL DATE – 1
067822.001215 Madison C22-977 stip order continue trial
NO.: 2:22-cv-00977-RSM

REED MCCLURE
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1 This motion is brought because additional time is needed to complete discovery due to
 2 unavailability of counsel and witnesses for depositions prior to the current discovery cut-off of
 3 April 17, 2023. These depositions include Rule 30(b)(6) depositions of each defendant and
 4 expert witnesses. In addition, in this case plaintiff is seeking insurance coverage for water
 5 damage allegedly occurring over the life of two condominium buildings, which were built around
 6 1985. Defendants recently located a former unit owner and board member who was active in the
 7 management and maintenance of the condominium for many years, and his deposition is being
 8 taken. Defendants also recently learned of a former property manager, and are subpoenaing
 9 records from that company. These sources could provide information about maintenance,
 10 repairs, and discovery of property damage in the past, and they could also lead to identification
 11 of other sources for investigation.

12 The parties propose the following case schedule:

	Current Deadline	Proposed Deadline
Discovery Cut-off	4/17/23	8/4/23
Filing of Dispositive Motions	5/16/23	9/7/23
Mediation if requested by parties	6/30/23	10/13/23
Filing of Motions in Limine	7/17/23	11/6/23
Agreed Pretrial Order	8/2/23	11/22/23
Trial Briefs, Proposed Voir Dire, Jury Instructions, Neutral Statement of Case, Trial Exhibits Due	8/9/23	11/29/23
Trial	8/14/23	12/4/23

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11 *Attorneys for Defendants*
12 *Travelers, Farmington, and Charter Oak*

13 IT IS SO ORDERED. Trial is continued to December 4, 2023. The Court shall issue and
14 amended Order Setting Trial and Related Dates extending all related pretrial deadlines similar
15 amount of time, beginning with disclosure of expert testimony.

16 DATED this 10th day of April, 2023.

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18 RICARDO S. MARTINEZ
19 UNITED STATES DISTRICT JUDGE